

Page 2 of 9  
16

Page: 2 of 7

2024-12-02 14:40:05 CST

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From: Commercial Lit



BREAZEALE, SACHSE & WILSON, L.L.P. | ATTORNEYS AT LAW

DANIELLE L. BOREL  
Partner  
danielle.borel@bswllp.com

DIRECT DIAL: (225) 381-8047  
CORPORATE PHONE: (225) 387-4000  
FAX: (225) 381-8029  
One American Place, 23rd Floor  
301 Main Street  
Baton Rouge, LA 70821-3197  
www.bswllp.com

December 2, 2024

VIA FACSIMILE (337-394-2240)

Honorable Laura Blanchard  
Clerk of Court  
Parish of St. Martin  
415 S. Main Street  
St. Martinville, LA 70582

RE: *Peppers Unlimited of Louisiana, Inc. v. Paper Systems, Inc. and R&D Engineering, Inc. of Earllham*  
BSW: 15092-1

Dear Ms. Blanchard:

Attached please find Plaintiffs' *Petition for Damages* to be fax filed today in the above-captioned matter. The original of this document and three (3) copies, including a copy to be prepared for long arm service, will be sent via Federal Express, along with our firm's check for filing costs once we receive fax confirmation of same.

Thank you for your assistance in this matter.

Sincerely,

BREAZEALE, SACHSE & WILSON, L.L.P.

Danielle L. Borel

DLB/csr  
Attachment

BATON ROUGE

NEW ORLEANS

MONROE  
BRIMAN5172813.v1

EXHIBIT "A"

PEPPERS UNLIMITED OF  
LOUISIANA, INC.

VERSUS

PAPER SYSTEMS, INC., AND R&D  
ENGINEERING, INC. OF EARLHAM

\* NUMBER: 94671 SECTION: "\_\_\_"  
\*  
\*  
\* 16th JUDICIAL DISTRICT COURT  
\*  
\* PARISH OF ST MARTIN  
\* STATE OF LOUISIANA

### PETITION FOR DAMAGES

The Petition for Damages filed by Peppers Unlimited of Louisiana, Inc. ("Peppers"), a Louisiana corporation, domiciled in St. Martin Parish, authorized to do and doing business in the State of Louisiana, respectfully represents as follows:

1.

Made Defendants herein are:

- i. Paper Systems, Inc. ("Paper System"), an Iowa corporation (Des Moines, IA), conducting business in the State of Louisiana; and
- ii. R&D Engineering, Inc. of Earlham ("R&D"), an Iowa corporation, conducting business in the State of Louisiana.

2.

Venue is proper under La. C.C.P. arts. 42(5), 73, and 76.1 and La. R.S. 13:3203, which is St. Martin Parish, Plaintiff's domicile and the delivery site of the Defendants' contractual obligations and products.

3.

Personal jurisdiction over the Defendants is proper under La. R.S. 13:3201.

### BACKGROUND

4.

Peppers is a family-owned Louisiana company that has been around since 1910. Peppers is a world-famous hot sauce production company, specializing in made-to-order blending, serving more than 1,000 customers worldwide, including national retail brands, top restaurant chains and large institutions. Peppers' is a complete production operation, from sourcing fruit to filling tankers.

5.

As part of its production process, Peppers sells pepper sauce products to customers in bulk.

6.

Peppers purchased EZ-Bulk 330-gallon totes (the "Totes") from Defendant Paper Systems for use in packing their pepper sauce products.

7.

The EZ Bulk Totes were purchased at a price of \$225/each.

8.

After purchase, Peppers received customer complaints regarding a leaking Tote. Thereafter, Peppers received numerous complaints from its customers that the Totes were leaking.

9.

After investigation, it was determined that the Totes contained an EZ Valve, which had a defective seal, and the defective seal allowed its contents—acidic peppers sauce—to leak.

10.

The leaks caused loss of product.

11.

The leaking Totes caused Peppers and its customers damage in the form of business interruption and extra costs during the cleaning and disposal required by Occupational Safety and Health Administration (OSHA) because the acidic pepper sauce is a contaminant when leaked. Further, as food facilities, the cleanings were held to expensive higher standards required by the Food and Drug Administration (FDA).

12.

As a result of the leaking Totes, Peppers' customers: i) refused to pay for the lost product, ii) deducted the costs of lost product and its cleaning from payment of other Peppers product, and iii) refused to accept any future Peppers' product in the Totes or refused to buy from Peppers outright.

13.

Some of Peppers' customers had more than one Paper Systems package leak at their facility and, therefore, refused to accept any further Peppers product in a Paper Systems product.

14.

Thus, offering Peppers' customers a replacement EZ Valve for the Tote was ineffective to mitigate product loss as the customers have no faith in the Tote at all.

15.

On May 27, 2024, Paper Systems acknowledged the Totes were defective and estimated Peppers had about 730 compromised Totes.

16.

In June of 2024, Paper Systems offered to "exchange" the compromised inventory. However, as Peppers explained, its customers refused any product in a Paper Systems product or a Tote, regardless of whether the liner or valve (or both) was replaced. As a result, this offer did not resolve Peppers' damages and their cause.

17.

Peppers requested a refund of the price paid for the 730 Totes from Paper Systems which, to date, has been refused.

18.

Peppers also requested that Paper Systems remove the faulty Totes, to no avail, which continue wasting valuable space in its production facility.

19.

Paper Systems' insurance adjustor has represented that R&D Moldings is the party that manufactured the liner that Paper Systems alleges is defective and was sold by Paper Systems as part of its Totes.

**COUNT ONE-REDHIBITION AGAINST PAPER SYSTEMS**

20.

Paper Systems sold the Totes to Peppers.

21.

The Totes sold by Paper Systems to Peppers contained a redhibitory defect in the form of improperly sealed valves and leaking liners. The defects existed at the time the Totes were delivered to Peppers.

22.

The redhibitory defect in the Totes and liners was not apparent to Peppers at the time of the sale. Indeed, prior Totes purchased did not leak and were not defective.

23.

Peppers was not aware that the Totes were defective when purchased from Paper Systems.

24.

The redhibitory defect has rendered the Totes so inconvenient that Peppers would not have purchased the Totes had it known of the leaking and defective valve and liners.

25.

Peppers notified Papers Systems of the defective Totes and provided Papers Systems with an opportunity to refund the purchase price as a repair was not possible and did not address customer concerns. Paper Systems failed to provide a refund or to remove the unusable Totes.

26.

Paper Systems is liable to Peppers for a return of the purchase price and its reasonable expenses, including customer refunds and Peppers' ongoing storage costs for the Totes.

27.

Consistent with a rescission of the sale, Peppers attempted to return the Totes to Paper Systems on multiple occasions, to no avail.

**COUNT TWO-REDHIBITION AGAINST R&D**

28.

Upon information and belief and representations from Paper Systems, R&D manufactured the EZ Valve and liner that caused the Totes to leak.

29.

As a manufacturer, R&D is legally deemed to be a bad faith seller.

30.

R&D is liable to Peppers for the purchase price, Peppers' expenses, all damages, and attorneys' fees.

**COUNT THREE-BREACH OF WARRANTY OF FITNESS FOR ORDINARY USE  
AGAINST PAPER SYSTEMS**

31.

Paper Systems, as the seller of the Totes, warranted that the Totes were reasonably fit for their ordinary use and especially the use of a pepper sauce manufacturer.

32.

The Totes were not reasonably fit for their ordinary use as they could not store liquids as intended. Rather, the Totes leaked the liquid intended to be stored.

33.

Paper Systems breached its implied warranties in the sale of the Totes to Peppers.

34.

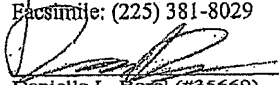
Paper Systems is liable to Peppers for the purchase price, Peppers' expenses, all damages, and attorneys' fees.

WHEREFORE, Peppers Unlimited of Louisiana, Inc. prays that Paper Systems, Inc. and R&D Engineering, Inc. of Earham be served with citation and a certified copy of the petition and that, after all delays have elapsed and due proceedings are had, there be a judgment rendered herein in favor of Peppers Unlimited of Louisiana, Inc. as follows:

1. In favor of Peppers Unlimited of Louisiana, Inc., finding that Paper Systems, Inc. and R&D Engineering, Inc. of Earham liable, in solido, for redhibition, and awarding Peppers Unlimited of Louisiana, Inc. a rescission of the purchase of the Totes, a reimbursement of the purchase price, Peppers' expenses, and all damages, costs, and attorneys' fees;
2. In favor of Peppers Unlimited of Louisiana, Inc., finding Paper Systems, Inc. liable for breach of warranty of fitness, and awarding Peppers Unlimited of Louisiana, Inc. a rescission of the sale and reimbursement of the purchase price; and
3. For all damages, losses, and all other just, legal, general and equitable relief.

Respectfully Submitted:

BREAZEALE, SACHSE & WILSON, L.L.P.  
2300 One American Place  
P.O. Box 3197  
Baton Rouge, Louisiana 70825  
Telephone: (225)387-4000  
Facsimile: (225) 381-8029

  
Danielle L. Borel (#35669)  
Mary Katherine Loos (# 39962)

Attorneys for Peppers Unlimited of Louisiana, Inc.

**PLEASE PREPARE AND RETURN**  
**A CERTIFIED COPY OF THE PETITION AND CITATION**  
**FOR SERVICE PURSUANT TO La. R.S. 13:3204:**

Paper Systems, Inc.  
through its registered agent  
WILLIAM L CHASE  
6127 WILLOWMERE DR.  
DES MOINES, IA, 50321

R&D Engineering, Inc. of Earham  
through its registered agent  
RODNEY M RAMSEY  
690 N CHESTNUT AVE  
EARHAM, IA, 50072

## FAX CONFIRMATION

PEPPERS UNLIMITED OF LOUISIANA INC

Versus

PAPER SYSTEMS INC - ET AL



Case: 094677

Division: C

16<sup>th</sup> Judicial District Court

Parish of St. Martin

State of Louisiana

Tax ID # 726001272

YOU ARE HEREBY INFORMED BY THIS FAX CONFIRMATION NOTICE THAT THE FOLLOWING HAS BEEN FILED BY FACSIMILE.

DATE FAX TRANSMISSION RECEIVED: DECEMBER 02, 2024DESCRIPTION OF TRANSMISSION: PETITION FOR DAMAGESFILED ON BEHALF OF: PLAINTIFF - PEPPERS UNLIMITED OF LOUISIANA, INC.PERSON SIGNING PLEADING: DANIELLE L. BOREL

This is to acknowledge that the above described facsimile transmission was received and filed on the date shown above as per LA R.S. 13:850.

The original pleading is to be forwarded within SEVEN (7) days, exclusive of legal holidays, of this confirmation together with the \$5.00 transmission fee; \$15.00 fee for this confirmation (WILL BE ADDED TO AMOUNT DUE); the correct filing fee to cover the cost of filing the facsimile copy as well as the original pleading and any balance of costs due. When the original pleading is received, the file mark will indicate the actual date it is received.

The record will contain the facsimile pleading, this confirmation and the original pleading, PLEASE ADD CASE NUMBER.

Laura B. Blanchard  
Clerk of the 16<sup>th</sup> Judicial District Court for  
St. Martin Parish, Louisiana

BY: H. J. Alexander

Deputy Clerk of Court

Confirmation faxed to number: 225.381.8029

Date confirmation faxed: DECEMBER 02, 2024

Amount due: \$535.00

[ FILE ]


Page 9 of 9

## Transmission Report

Date/Time 12-02-2024 04:08:06 p.m. Transmit Header Text  
Local ID 1 3373942240 Local Name 1 StMartin

This document : Confirmed  
(reduced sample and details below)  
Document size : 8.5"x14"

**FAX CONFIRMATION**

<b>PEPPERS UNLIMITED OF LOUISIANA INC</b> Yaris PAPER SYSTEMS INC - ET AL		Case 094677 Division C 14th Judicial District Court Parish of St. Martin State of Louisiana Tax ID # 726001272
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YOU ARE HEREBY INFORMED BY THIS FAX CONFIRMATION NOTICE THAT THE FOLLOWING HAS BEEN FILED BY FACSIMILE.

DATE FAX TRANSMISSION RECEIVED: DECEMBER 02, 2024

DESCRIPTION OF TRANSMISSION: PETITION FOR DAMAGES

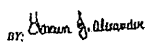
FILED ON BEHALF OF: PLAINTIFF- PEPPERS UNLIMITED OF LOUISIANA, INC.

PERSON SIGNING PLEADING: DANIELLE L. ROEL

*This is to acknowledge that the above described facsimile transmission was received and filed on the date shown above as per LA R.S. 13:550.*

*The original pleading is to be forwarded within SEVEN (7) days, exclusive of legal holidays, of this confirmation together with the \$1.00 transmission fee, \$15.00 fee for this confirmation (WILL BE ADDED TO AROUND DUES), the correct filing fee to cover the cost of filing the facsimile copy as well as the original pleading and any balance of costs due. When the original pleading is received, the file mark will indicate the actual date it is received.*

*This record will contain the facsimile pleading, this confirmation and the original pleading, PLEASE ADD CASE NUMBER.*

*Laura R. Blanchard*  
 Clerk of the 14th Judicial District Court for  
 St. Martin Parish, Louisiana  
 BY:   
 Deputy Clerk of Court

Confirmation faxed to number: 225.381.8029

Date confirmation faxed: DECEMBER 02, 2024

Amount due: \$535.00

[ YLR ]

Total Pages Scanned : 1

Total Pages Confirmed : 1

No.	Job	Remote Station	Start Time	Duration	Pages	Line	Mode	Job Type	Results
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Abbreviations:  
HS: Host send  
HR: Host receive  
WS: Waiting send

PL: Polled local  
PR: Polled remote  
MS: Mailbox save

MP: Mailbox print  
RP: Report  
FF: Fax Forward

CP: Completed  
FA: Fall  
TU: Terminated by user

TS: Terminated by system  
G3: Group 3  
EC: Error Correct



PEPPERS UNLIMITED OF  
LOUISIANA, INC.

VERSUS

PAPER SYSTEMS, INC., AND R&D  
ENGINEERING, INC. OF EARLHAM

\* NUMBER: 94677 SECTION: "C"  
\*  
\*  
\* 16th JUDICIAL DISTRICT COURT  
\*  
\* PARISH OF ST MARTIN  
\* STATE OF LOUISIANA

---

**PETITION FOR DAMAGES**

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Personal jurisdiction over the Defendants is proper under La. R.S. 13:3201.

**BACKGROUND**

4.

Peppers is a family-owned Louisiana company that has been around since 1910. Peppers is a world-famous hot sauce production company, specializing in made-to-order blending, serving more than 1,000 customers worldwide, including national retail brands, top restaurant chains and large institutions. Peppers' is a complete production operation, from sourcing fruit to filling tankers.

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Thus, offering Peppers' customers a replacement EZ Valve for the Tote was ineffective to mitigate product loss as the customers have no faith in the Tote at all.

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On May 27, 2024, Paper Systems acknowledged the Totes were defective and estimated Peppers had about 730 compromised Totes.

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25.

Peppers notified Papers Systems of the defective Totes and provided Papers Systems with an opportunity to refund the purchase price as a repair was not possible and did not address customer concerns. Paper Systems failed to provide a refund or to remove the unusable Totes.

26.

Paper Systems is liable to Peppers for a return of the purchase price and its reasonable expenses, including customer refunds and Peppers' ongoing storage costs for the Totes.

27.

Consistent with a rescission of the sale, Peppers attempted to return the Totes to Paper Systems on multiple occasions, to no avail.

**COUNT TWO-REDHIBITION AGAINST R&D**

28.

Upon information and belief and representations from Paper Systems, R&D manufactured the EZ Valve and liner that caused the Totes to leak.

29.

As a manufacturer, R&D is legally deemed to be a bad faith seller.

30.

R&D is liable to Peppers for the purchase price, Peppers' expenses, all damages, and attorneys' fees.

**COUNT THREE-BREACH OF WARRANTY OF FITNESS FOR ORDINARY USE  
AGAINST PAPER SYSTEMS**

31.

Paper Systems, as the seller of the Totes, warranted that the Totes were reasonably fit for their ordinary use and especially the use of a pepper sauce manufacturer.

32.

The Totes were not reasonably fit for their ordinary use as they could not store liquids as intended. Rather, the Totes leaked the liquid intended to be stored.

33.

Paper Systems breached its implied warranties in the sale of the Totes to Peppers.

34.

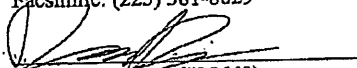
Paper Systems is liable to Peppers for the purchase price, Peppers' expenses, all damages, and attorneys' fees.

WHEREFORE, Peppers Unlimited of Louisiana, Inc. prays that Paper Systems, Inc. and R&D Engineering, Inc. of Earham be served with citation and a certified copy of the petition and that, after all delays have elapsed and due proceedings are had, there be a judgment rendered herein in favor of Peppers Unlimited of Louisiana, Inc. as follows:

1. In favor of Peppers Unlimited of Louisiana, Inc., finding that Paper Systems, Inc. and R&D Engineering, Inc. of Earham liable, in solido, for redhibition, and awarding Peppers Unlimited of Louisiana, Inc. a rescission of the purchase of the Totes, a reimbursement of the purchase price, Peppers' expenses, and all damages, costs, and attorneys' fees;
2. In favor of Peppers Unlimited of Louisiana, Inc., finding Paper Systems, Inc. liable for breach of warranty of fitness, and awarding Peppers Unlimited of Louisiana, Inc. a rescission of the sale and reimbursement of the purchase price; and
3. For all damages, losses, and all other just, legal, general and equitable relief.

Respectfully Submitted:

BREAZEALE, SACHSE & WILSON, L.L.P.  
2300 One American Place  
P.O. Box 3197  
Baton Rouge, Louisiana 70825  
Telephone: (225) 387-4000  
Facsimile: (225) 381-8029

  
Danielle L. Borol (#35669)  
Mary Katherine Loos (# 39962)

*Attorneys for Peppers Unlimited of Louisiana, Inc.*

**PLEASE PREPARE AND RETURN**  
**A CERTIFIED COPY OF THE PETITION AND CITATION**  
**FOR SERVICE PURSUANT TO La. R.S. 13:3204:**

Paper Systems, Inc.  
through its registered agent  
WILLIAM L CHASE  
6127 WILLOWMERE DR.  
DES MOINES, IA, 50321

R&D Engineering, Inc. of Earham  
through its registered agent  
RODNEY M RAMSEY  
690 N CHESTNUT AVE  
EARHAM, IA, 50072

RECEIVED AND FILED

2024 DEC -4 AM 9:34

  
DEPUTY CLERK OF COURT  
ST. MARTIN PARISH

## CITATION

PEPPERS UNLIMITED OF LOUISIANA INC

Versus

PAPER SYSTEMS INC - ET AL



Case: 094677

Division: C

16<sup>th</sup> Judicial District Court

Parish of St. Martin

State of Louisiana

TO:

R&D ENGINEERING INC OF EARLHAM  
THROUGH THE LOUISIANA LONG ARM STATUTE  
THROUGH ITS REGISTERED AGENT  
RODNEY M. RAMSEY  
690 N. CHESTNUT AVE.  
EARLHAM, LA 50072

## THROUGH THE LOUISIANA LONG ARM STATUTE

You are hereby summoned to comply with the demand contained in the PETITION FOR DAMAGES of which a true and correct copy (exclusive of exhibits) accompanies this citation, or make an appearance, either by filing a pleading or otherwise, in the 16th Judicial District Court in and for the Parish of St. Martin, State of Louisiana, within thirty (30) days after the service hereof, under penalty of default.

WITNESS MY OFFICIAL HAND AND SEAL OF OFFICE AT ST. MARTINVILLE, LOUISIANA, on this 9th day of DECEMBER, 2024.

LAURA B. BLANCHARD  
Clerk of the 16<sup>th</sup> Judicial District Court for  
St. Martin Parish, Louisiana

BY:

Deputy Clerk of Court

REQUESTED BY:  
DANIELLE L. BOREL  
ATTORNEY FOR PEPPERS UNLIMITED OF LOUISIANA, INC.

Service Information

Received on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ and on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ served the above-named party as follows:

Personal Service on the party herein named \_\_\_\_\_  
Domiciliary Service on the party herein named by leaving the same at his/her domicile in the parish in the hands of \_\_\_\_\_, a person apparently over the age of seventeen years, living and residing in said domicile and whose name and other facts connected with this service, I learned by interrogating the said person, said party herein being absent from his/her residence at the time of said service.

Returned:  
Parish of \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

Service \$ \_\_\_\_\_

Mileage \$ \_\_\_\_\_

Total \$ \_\_\_\_\_

By: \_\_\_\_\_  
Deputy Sheriff

[ FILE ]

## CITATION

PEPPERS UNLIMITED OF LOUISIANA INC

Versus

PAPER SYSTEMS INC - ET AL



Case: 094677

Division: C

16<sup>th</sup> Judicial District Court

Parish of St. Martin

State of Louisiana

TO:

PAPER SYSTEMS INC  
THROUGH THE LOUISIANA LONG ARM STATUTE  
THROUGH ITS REGISTERED AGENT  
WILLIAM L. CHASE  
6127 WILLOWMERE DRIVE  
DES MOINES, IA 50321

THROUGH THE LOUISIANA LONG ARM STATUTE

You are hereby summoned to comply with the demand contained in the PETITION FOR DAMAGES of which a true and correct copy (exclusive of exhibits) accompanies this citation, or make an appearance, either by filing a pleading or otherwise, in the 16th Judicial District Court in and for the Parish of St. Martin, State of Louisiana, within thirty (30) days after the service hereof, under penalty of default.

WITNESS MY OFFICIAL HAND AND SEAL OF OFFICE AT ST. MARTINVILLE, LOUISIANA, on this 9th day of DECEMBER, 2024.

LAURA B. BLANCHARD  
Clerk of the 16<sup>th</sup> Judicial District Court for  
St. Martin Parish, Louisiana

BY:

Deputy Clerk of Court

REQUESTED BY:  
DANIELLE L. BOREL  
ATTORNEY FOR PEPPERS UNLIMITED OF LOUISIANA, INC.

Service Information

Received on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ and on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ served the above-named party as follows:

*Personal Service on the party herein named \_\_\_\_\_*  
*Domiciliary Service on the party herein named by leaving the same at his/her domicile in the parish in the hands of \_\_\_\_\_, a person apparently over the age of seventeen years, living and residing in said domicile and whose name and other facts connected with this service, I learned by interrogating the said person, said party herein being absent from his/her residence at the time of said service.*

Returned: \_\_\_\_\_  
Parish of \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

Service \$ \_\_\_\_\_

Mileage \$ \_\_\_\_\_

Total \$ \_\_\_\_\_

By: \_\_\_\_\_  
Deputy Sheriff

[ FILE ]

TO: DANIELLE L. BOREL FROM: Laura B Blanchard  
ATTORNEY AT LAW Clerk of Court, St. Martin Parish  
P. O. BOX 3197 P. O. Box 308, St. Martinville, LA 70582  
BATON ROUGE, LA 70825 Phone: 337-394-2210 Fax: 337-394-2240

RE: SUIT NO. 94677-C PROBATE NO.

PEPPERS UNLIMITED OF LOUISIANA, INC.

VS.

PAPER SYSTEMS INC., ET AL

I AM ENCLOSING 2 CITATION ALONG WITH 2 TRUE COPIES OF PETITION FOR  
DAMAGES FOR SERVICES ON PAPER SYSTEMS INC. THROUGH WILLIAM L. CHASE  
THROUGH THE LOUISIANA LONG ARM STATUTE AND R&D ENGINEERING INC. OF EARLHAM  
THROUGH RODNEY RAMSEY THROUGH THE LOUISIANA LONG ARM STATUTE.

Date of Notice December 9, 2024

Kristie Prejean  
Deputy Clerk of Court



Laura B. Blanchard  
Clerk of Court  
P.O. Box 308  
St. Martinville, La. 70582

Ph. #337/394-2210  
Fax. #337/394-2240

### NEW CIVIL SUIT FILING CERTIFICATION

STATE OF LOUISIANA  
PARISH OF ST. MARTIN

TO:  
DANIELLE L. BOREL  
ATTORNEY AT LAW  
P. O. BOX 3197  
BATON ROUGE, LA 70825

THIS CERTIFIES THAT ON THE 2ND DAY OF DECEMBER, 2024 THE BELOW  
ENTITLED CASE HAS BEEN FILED FOR RECORD IN THIS OFFICE.

PEPPERS UNLIMITED OF LOUISIANA, INC.

VS. # 94677

PAPER SYSTEMS INC., ET AL

DIVISION C

JUDGE VINCENT J. BORNE

  
\_\_\_\_\_  
DEPUTY CLERK OF COURT  
ST. MARTIN PARISH

Page 10 of 10



BREAZEALE, SACHSE & WILSON, L.L.P. | ATTORNEYS AT LAW

FILE

December 2, 2024

DANIELLE L. BOREL  
Partner  
dan@bsw.com  
DIRECT DIAL: (225) 381-8047  
CORPORATE PHONE: (225) 387-4000  
FAX: (225) 381-8029  
One American Place, 23rd Floor  
301 Main Street  
Baton Rouge, LA 70821-3197  
www.bswllp.com

VIA FACSIMILE (337-394-2240)

Honorable Laura Blanchard  
Clerk of Court  
Parish of St. Martin  
415 S. Main Street  
St. Martinville, LA 70582

RE: *Peppers Unlimited of Louisiana, Inc. v. Paper Systems, Inc. and R&D  
Engineering, Inc. of Earham*  
BSW: 15092-1

Dear Ms. Blanchard:

Attached please find Plaintiffs' *Petition for Damages* to be fax filed today in the above-captioned matter. The original of this document and three (3) copies, including a copy to be prepared for long arm service, will be sent via Federal Express, along with our firm's check for filing costs once we receive fax confirmation of same.

Thank you for your assistance in this matter.

Sincerely,

BREAZEALE, SACHSE & WILSON, L.L.P.

A handwritten signature in black ink, appearing to read 'Danielle Borel', written over a horizontal line.

Danielle L. Borel

DLB/csr  
Attachment

RECEIVED AND FILED

2024 DEC -4 AM 9:33

A handwritten signature in black ink, appearing to read 'Kristin Pyle', written over a horizontal line.  
DEPUTY CLERK OF COURT  
ST. MARTIN PARISH

BATON ROUGE

NEW ORLEANS

MONROE

BRIMAN5172813.v1

Page 1 of 9  
To:

Page: 1 of 7

2025-01-02 13:55:00 CST

12254108157

From: Commercial Lit



BREAZEALE, SACHSE & WILSON, L.L.P. | ATTORNEYS AT LAW

One America Place, 23<sup>rd</sup> Floor  
Post Office Box 3197  
Phone: 225-387-4000  
Fax No.: 225-381-8029

## FACSIMILE COVER SHEET

January 2, 2025

Total Number of Pages (including cover sheet): 7

To:	Clerk, St. Martin Parish
Company:	16 <sup>th</sup> Judicial District Court
Fax:	1-337-394-2240
Main No.:	1-337-394-2210

From:	Lori Manning
Direct Dial:	225-376-3609
Attorney/Client/Matter:	Danielle Borel (17131-2)
If there are any questions or if you are not receiving all of these pages, please call us at 225-387-4000 extension 3609 and ask for Lori Manning.	

MESSAGE: *Peppers Unlimited of Louisiana v. Paper Systems, Inc., et al*; Suit No. 94,677, Div. "C," 16<sup>th</sup> Judicial District Court; St. Martin Parish, Louisiana

Dear Ms. Patin:

In regard to the referenced suit, please find following, for fax-filing, two Affidavits of Mailing on behalf of Plaintiff, Peppers Unlimited of Louisiana, Inc.

Please provide confirmation of the fax-filing along with costs so we may include our check with the original.

Thank you,  
Lori Manning

### CONFIDENTIALITY NOTICE

The information contained in this facsimile message is legally privileged and confidential information intended only for the use of the individual or entity named above. You are hereby notified that any dissemination, distribution, copying, or use of or reliance upon the information contained in and transmitted with this facsimile by or to anyone other than the recipient designated above by the sender is unauthorized and strictly prohibited. If you have received this facsimile in error, please notify Breazeale, Sachse & Wilson, L.L.P. by telephone at 225-387-4000 immediately. Any facsimile erroneously transmitted to you should be immediately returned to the sender by U.S. Mail, or if authorization is granted by the sender, destroyed.

BATON ROUGE

NEW ORLEANS

MONROE

PEPPERS UNLIMITED OF  
LOUISIANA, INC.

VERSUS

PAPER SYSTEMS, INC. AND R&D  
ENGINEERING, INC. OF EARLHAM

\* NUMBER: 94,677 DIVISION: "C"  
\*  
\*  
\* 16th JUDICIAL DISTRICT COURT  
\*  
\* PARISH OF ST. MARTIN  
\*  
\* STATE OF LOUISIANA

AFFIDAVIT OF MAILING

STATE OF LOUISIANA

PARISH OF EAST BATON ROUGE

BEFORE ME, the undersigned authority, personally came and appeared:

LORI MANNING

who after being duly sworn, did say that she is a legal assistant with the law firm of Breazeale, Sachse & Wilson, L.L.P., 23rd Floor, 301 Main Street (70801), Post Office Box 3197, Baton Rouge, Louisiana 70821; that she served a certified copy of a Petition for Damages under Louisiana Long Arm Statute, La. R.S. 13:3201, *et seq.*, by mailing said copy, postage prepaid, to the defendant named below at the address shown, by certified mail, number 70211970000128895327, return receipt requested:

Paper Systems, Inc.  
Through its registered agent for service  
William L. Chase  
6127 Willowmere Drive  
Des Moines, IA 50321

Affiant further shows that service to Paper Systems, Inc., through Mr. William L. Chase, was returned by the Post Office showing delivery on December 23, 2024, of the document as being received, as shown on the return receipt, proof of which is attached hereto and made a part hereof.

Lori Manning  
LORI MANNING

SWORN TO AND SUBSCRIBED, before me, this \_\_\_ day of January, 2025.

Danielle L. Borel  
NOTARY PUBLIC

Danielle L. Borel  
Bar Roll No. 35669  
My Commission Expires: at death



OFFICIAL SEAL  
DANIELLE BOREL  
LA BAR ROLL #35669  
NOTARY PUBLIC ID NO. 140225  
STATE OF LOUISIANA  
PARISH OF EAST BATON ROUGE  
My Commission is for Life

Page 3 of 9  
10

Page: 3 of 7

2025-01-02 13:56:00 CST

12254106157

From: Commercial Lit

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<input type="checkbox"/> Complete items 1, 2, and 3. <input type="checkbox"/> Print your name and address on the reverse, so that we can return the card to you. <input type="checkbox"/> Attach this card to the back of the mail piece, or on the front if space permits.		<input type="checkbox"/> A. Signature <input checked="" type="checkbox"/> B. Received by (Printed Name) <input type="checkbox"/> C. Date of Delivery	
1. Article Addressed to: Paper Systems, Inc. Through its registered agent William L. Chase 6127 Willowmere Drive Des Moines, IA 50321		D. Is delivery address different from item 1? <input type="checkbox"/> Yes If Yes, enter delivery address below: <input type="checkbox"/> No	
2. Article Number (Transfer from service label) 9590 9402 6897 0900 4735 44		3. Service Type <input type="checkbox"/> Registered Mail <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Certified Mail <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Insured Mail Restricted Delivery	
7021 1470 0001 2884 5327		<input type="checkbox"/> Priority Mail Express <input type="checkbox"/> Registered Mail <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation <input type="checkbox"/> Signature Confirmation Restricted Delivery	
PS Form 3811, July 2020 PSN 7530-02-000-9053		Domestic Return Receipt	

PEPPERS UNLIMITED OF  
LOUISIANA, INC.

VERSUS

PAPER SYSTEMS, INC. AND R&D  
ENGINEERING, INC. OF EARLHAM

\* NUMBER: 94,677 DIVISION: "C"  
\*  
\*  
\* 16th JUDICIAL DISTRICT COURT  
\*  
\* PARISH OF ST. MARTIN  
\*  
STATE OF LOUISIANA

### AFFIDAVIT OF MAILING

STATE OF LOUISIANA

PARISH OF EAST BATON ROUGE

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R&D Engineering, Inc. of Earlham  
Through its registered agent for service  
Rodney M. Ramsey  
690 Chestnut Avenue  
Earlham, LA 50072

Affiant further shows that service to R&D Engineering, Inc. of Earlham, through Mr. Rodney M. Ramsey, was made on December 23, 2024, as shown on the attached USPS Tracking page. Also attached is the signed return receipt.

  
LORI MANNING

SWORN TO AND SUBSCRIBED, before me, this 2<sup>nd</sup> day of January, 2025.

  
NOTARY PUBLIC

Danielle L. Borel  
Bar Roll No. 35669  
My Commission Expires: at death



OFFICIAL SEAL  
DANIELLE BOREL  
LA BAR ROLL #35669  
NOTARY PUBLIC ID NO. 140225  
STATE OF LOUISIANA  
PARISH OF EAST BATON ROUGE  
My Commission is for Life

Page 5 of 9  
To:

Page: 5 of 7

2025-01-02 13:55:00 CST

12254106157

From: Commercial Lit

12/26/24, 10:31 AM

USPS.com® - USPS Tracking® Results

ALERT: CANADA POST ADVISES THAT THE STRIKE BY ITS EMPLOYEES HAS ENDED. HOWEV...

USPS Tracking®

FAQs >

Tracking Number:

Remove X

70211970000128897710

Copy

Add to Informed Delivery (<https://informedelivery.usps.com/>)

### Latest Update

Your item was delivered to an individual at the address at 10:42 am on December 23, 2024 in EARLHAM, IA 50072.

### Get More Out of USPS Tracking:

USPS Tracking Plus®

### Delivered

Delivered, Left with Individual

EARLHAM, IA 50072

December 23, 2024, 10:42 am

See All Tracking History

What Do USPS Tracking Statuses Mean? (<https://faq.usps.com/s/article/Where-is-my-package>)

Text & Email Updates

USPS Tracking Plus®

Product Information

See Less ^

Track Another Package

[https://tools.usps.com/go/TrackConfirmAction?qt\\_c\\_tlLabels1=70211970000128897710](https://tools.usps.com/go/TrackConfirmAction?qt_c_tlLabels1=70211970000128897710)

1/2

Page 6 of 9  
To:

Page: 6 of 7

2025-01-02 13:55:00 CST

12254108157

From: Commercial Lit

12/28/24, 10:31 AM

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Enter tracking or barcode numbers

## Need More Help?

Contact USPS Tracking support for further assistance.

FAQs



To:  
Page 7 of 9

Page: 7 of 7

2025-01-02 13:55:00 CST

12254108157

From: Commercial I

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>1. Complete items 1, 2, and 3.</p> <p>2. Print your name and address on the reverse so that we can return the card to you.</p> <p>3. Attach this card to the back of the mail piece, or on the front if space permits.</p>		<p>A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Print Name) <input checked="" type="checkbox"/> Date of Delivery</p> <p>C. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If YES, enter delivery address below: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</p>	
<p>Article Addressed to:</p> <p>R&amp;D Engineering, Inc. of Earlham Through its registered agent Rodney M. Ramsey 690 Chestnut Avenue Earlham, IA 50072</p>		<p>D. Service Type</p> <p><input type="checkbox"/> Priority Mail Express <input type="checkbox"/> Registered Mail <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Signature Restricted Delivery <input type="checkbox"/> Signature Restricted Delivery <input type="checkbox"/> Signature Restricted Delivery <input type="checkbox"/> Signature Restricted Delivery <input type="checkbox"/> Signature Restricted Delivery</p>	
<p>2. Article Number (Transaction Service Label)</p> <p>7021 1870 0001 2689 7710 112</p>		<p>Domestic Return Receipt</p>	

PS Form 3811, July 2020 PSN 7536-02-000-9053

## FAX CONFIRMATION

PEPPERS UNLIMITED OF LOUISIANA INC

Versus

PAPER SYSTEMS INC - ET AL



Case: 094677

Division: C

16<sup>th</sup> Judicial District Court

Parish of St. Martin

State of Louisiana

Tax ID # 726001272

YOU ARE HEREBY INFORMED BY THIS FAX CONFIRMATION NOTICE THAT THE FOLLOWING HAS BEEN FILED BY FACSIMILE.

DATE FAX TRANSMISSION RECEIVED: January 02, 2024DESCRIPTION OF TRANSMISSION: Affidavit of MailingFILED ON BEHALF OF: PlaintiffPERSON SIGNING PLEADING: Danielle L. Borel

This is to acknowledge that the above described facsimile transmission was received and filed on the date shown above as per LA R.S. 13:850.

The original pleading is to be forwarded within SEVEN (7) days, exclusive of legal holidays, of this confirmation together with the \$5.00 transmission fee; \$15.00 fee for this confirmation(WILL BE ADDED TO AMOUNT DUE); the correct filing fee to cover the cost of filing the facsimile copy as well as the original pleading and any balance of costs due. When the original pleading is received, the file mark will indicate the actual date it is received.

The record will contain the facsimile pleading, this confirmation and the original pleading, PLEASE ADD CASE NUMBER.

Laura B. Blanchard  
Clerk of the 16<sup>th</sup> Judicial District Court for  
St. Martin Parish, Louisiana

BY: Doreen J. Alexander

Deputy Clerk of Court

Confirmation faxed to number: 225-381-8029

Date confirmation faxed: January 02, 2025

Amount due: \$0.00 - Enough funds on account

[ FILE ]

Page 9 of 9

## Transmission Report

Date/Time  
Local ID 1

01-02-2025  
3373942240

02:46:26 p.m.

Transmit Header Text  
Local Name 1

StMartin

This document : Confirmed  
(reduced sample and details below)  
Document size : 8.5"x14"

**FAX CONFIRMATION**

PEPPERS UNLIMITED OF LOUISIANA INC.  
Verpus  
PAPER SYSTEMS INC. - AT-AL

Center 014677  
Division: C  
10<sup>th</sup> Judicial District Court  
Parish of St. Martin  
State of Louisiana  
Tax ID # 724641377

YOU ARE HEREBY INFORMED BY THIS FAX CONFIRMATION NOTICE THAT THE FOLLOWING HAS BEEN FILED BY FACSIMILE.

DATE FAX TRANSMISSION RECEIVED: January 02, 2025  
DESCRIPTION OF TRANSMISSION: Affidavit of Motions  
FILED ON BEHALF OF: Plaintiff  
PERSON SIGNING PLEADING: Danielle L. Rinal

This is to acknowledge that the above described facsimile transmission was received and filed on the date shown above as per LA R.S. 13:550.

The original pleading is to be forwarded within SEVEN (7) days, exclusive of legal holidays, of this confirmation together with the \$3.00 transmission fee; \$15.00 fee for this confirmation (WILL BE ADDED TO AMOUNT DUE); the correct filing fee to cover the cost of filing the facsimile copy as well as the original pleading and any balance of costs due. When the original pleading is received, the file mark will indicate the actual date it is received.

The record will contain the facsimile pleading, this confirmation and the original pleading. PLEASE ADD CASE NUMBER.

Laura B. Blanchard  
Clerk of the 10<sup>th</sup> Judicial District Court for  
St. Martin Parish, Louisiana

BY: Laura B. Blanchard  
Deputy Clerk of Court

Confirmation faxed to number: 225-381-8029  
Date confirmation faxed: January 03, 2025  
Amount due: \$18.00 - (Enough funds on account)

( FILE )

Total Pages Scanned : 1

Total Pages Confirmed : 1

No.	Job	Remote Station	Start Time	Duration	Pages	Line	Mode	Job Type	Results
001	146	912253818029	02:45:17 p.m. 01-02-2025	00:00:25	1/1	1	EC	HS	CP19200

Abbreviations:  
HS: Host send  
HR: Host receive  
WS: Waiting send

PL: Polled local  
PR: Polled remote  
MS: Mailbox save

MP: Mailbox print  
RP: Report  
FF: Fax Forward

CP: Completed  
FA: Fail  
TU: Terminated by user

TS: Terminated by system  
G3: Group 3  
EC: Error Correct

PEPPERS UNLIMITED OF  
LOUISIANA, INC.

VERSUS

PAPER SYSTEMS, INC. AND R&D  
ENGINEERING, INC. OF EARLHAM

\* NUMBER: 94,677 DIVISION: "C"  
\*  
\*  
\* 16th JUDICIAL DISTRICT COURT  
\*  
\* PARISH OF ST. MARTIN  
\*  
STATE OF LOUISIANA

AFFIDAVIT OF MAILING

FILE

STATE OF LOUISIANA

PARISH OF EAST BATON ROUGE

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NOTARY PUBLIC

Danielle L. Borel  
Bar Roll No. 35669  
My Commission Expires: at death



OFFICIAL SEAL  
DANIELLE BOREL  
LA BAR ROLL #35669  
NOTARY PUBLIC ID NO. 140225  
STATE OF LOUISIANA  
PARISH OF EAST BATON ROUGE  
My Commission is for Life

RECEIVED AND FILED

2025 JAN -7 PM 3:28

  
DEPUTY CLERK OF COURT  
ST. MARTIN PARISH

Page 2 of 8  
12/26/24, 10:31 AM

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ALERT: CANADA POST ADVISES THAT THE STRIKE BY ITS EMPLOYEES HAS ENDED. HOWEV...

USPS Tracking®

FAQs >

Tracking Number:

70211970000128897710

Remove X

Copy Add to Informed Delivery (<https://informedelivery.usps.com/>)

#### Latest Update

Your item was delivered to an individual at the address at 10:42 am on December 23, 2024 in EARLHAM, IA 50072.

Get More Out of USPS Tracking:

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Feedback

#### Delivered

Delivered, Left with Individual

EARLHAM, IA 50072

December 23, 2024, 10:42 am

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What Do USPS Tracking Statuses Mean? (<https://faq.usps.com/s/article/Where-is-my-package>)

Text & Email Updates



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Product Information



See Less ^

Track Another Package



[https://tools.usps.com/go/TrackConfirmAction?qt\\_c\\_tlLabels1=70211970000128897710](https://tools.usps.com/go/TrackConfirmAction?qt_c_tlLabels1=70211970000128897710)

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Page 3 of 8  
12/28/24, 10:31 AM

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FAQs

Page 4 of 6

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<p>1. Article Addressed to:</p> <p>R&amp;D Engineering, Inc. of Earham Through its registered agent Rodney M. Ramsey 690 Chestnut Avenue Earham, LA 50072</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
<p>2. Article Number (Transfer from service label)</p> <p>9590 9402 6397 0303 4733 51</p>		<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Priority Mail Express®  <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail™  <input type="checkbox"/> Certified Mail <input type="checkbox"/> Registered Mail Restricted Delivery  <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation™  <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery  <input type="checkbox"/> Collect on Delivery Restricted Delivery</p>	
<p>PS Form 3811, July 2020 PSN 7530-02-000-9053</p>		<p>Domestic Return Receipt</p>	

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2025 JAN -7 PM 3:28

DEPUTY CLERK OF COURT  
ST. MARTIN PARISH

PEPPERS UNLIMITED OF LOUISIANA, INC.	*	NUMBER: 94,677	DIVISION: "C"
	*		
VERSUS	*	16th JUDICIAL DISTRICT COURT	
	*		
PAPER SYSTEMS, INC. AND R&D ENGINEERING, INC. OF EARLHAM	*	PARISH OF ST. MARTIN	
	*	STATE OF LOUISIANA	

**AFFIDAVIT OF MAILING**

STATE OF LOUISIANA

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NOTARY PUBLIC

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Bar Roll No. 35669  
My Commission Expires: at death

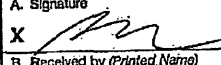
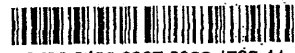


OFFICIAL SEAL  
DANIELLE BOREL  
LA BAR ROLL #35669  
NOTARY PUBLIC ID NO. 140225  
STATE OF LOUISIANA  
PARISH OF EAST BATON ROUGE  
My Commission is for Life

RECEIVED AND FILED  
2025 JAN -7 PM 3:28  
DEPUTY CLERK OF COURT  
ST. MARTIN PARISH



Page 6 of 6

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<ul style="list-style-type: none"><li>■ Complete items 1, 2, and 3;</li><li>■ Print your name and address on the reverse so that we can return the card to you.</li><li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li></ul>		<b>A. Signature</b> <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee 	
<b>1. Article Addressed to:</b> Paper Systems, Inc. Through its registered agent William L. Chase 6127 Willowhatch Drive Des Moines, IA 50321		<b>B. Received by (Printed Name)</b> Angela Madison	<b>C. Date of Delivery</b> 12-23-22
 9590 9402 6397 0303 4733 44		<b>D. Is delivery address different from item 1?</b> <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	
<b>2. Article Number (transfer from service label)</b> 7021 1470 0001 2889 9327		<b>3. Service Type</b> <input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Insured Mail Restricted Delivery® <input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery	
PS Form 3811, July 2020 PSN 7530-02-000-9053		Domestic Return Receipt	

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DEPUTY CLERK OF COURT  
ST. MARTIN PARISH